



David L. Hecht  
Partner  
P: (212) 851-6821  
E: [dhecht@hechtpartners.com](mailto:dhecht@hechtpartners.com)

**VIA ECF**

October 7, 2021

Hon. Lorna G. Schofield  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

RE: *Solid 21, Inc. v. Richemont North America, Inc. et al*, Case No. 1:19-cv-01262-LGS

Dear Judge Schofield,

We represent Plaintiff Solid 21, Inc. ("Solid 21") in the above captioned matter. Solid 21's opposition to Defendant's Motion for Summary Judgment as well as Plaintiff's Cross-Motion for Summary Judgment is due today, October 7, 2021. See ECF No. 134. We respectfully request that permission to file under seal Exhibit 1 and Exhibit 2 to the Hecht Declaration filed in support of Plaintiff's Opposition to Defendant's Motion for Summary Judgment and Cross-Motion for Summary Judgment. Consistent with Section I(D)(iii) of this Court's Individual Rules, these documents will be filed under seal on ECF and electronically related to this letter motion.

Counsel for Plaintiff files these documents fully under seal in an abundance of caution, as Defendant has previously designated these documents as Attorney's Eyes Only, Highly Confidential, or Confidential pursuant to the Protective Order.

Solid 21 thanks the Court for its consideration in this matter.

Respectfully Submitted,

/s/ David L. Hecht  
David L. Hecht  
Hecht Partners LLP  
125 Park Avenue, 25<sup>th</sup> Floor  
New York, NY 10017  
Tel: 212-851-6821  
Email: [dhecht@hechtpartners.com](mailto:dhecht@hechtpartners.com)

*Attorney for Plaintiff Solid 21, Inc.*

cc. Counsel of Record (via ECF)

October 7, 2021

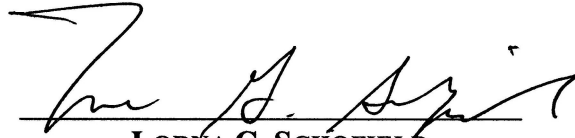
Page 2

*Appendix identifying all parties and attorneys of record  
who should have access to the sealed documents*

David L. Hecht, Counsel for Plaintiff  
Yi Wen Wu, Counsel for Plaintiff  
Andrew J. Lorin, Counsel for Plaintiff  
John P. Margiotta, Counsel for Defendant  
David Donahue, Counsel for Defendant  
Laura E. Popp-Rosenberg, Counsel for Defendant  
Daniel M. Nuzzaci, Counsel for Defendant  
Emily S. Weiss, Counsel for Defendant  
Sydney L. Kipen, Counsel for Defendant

Defendant shall file a response by **October 15, 2021**, stating whether they seek to seal Exhibits 1 and 2 to the Hecht Declaration. If Defendant seeks to seal those documents, Defendant shall provide the basis for sealing in accordance with the three-part test in *Lugosch*. See *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). If Defendants believe redactions are appropriate, they shall also submit proposed redactions. So Ordered.

Dated: October 8, 2021  
New York, New York



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**